

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-cr-30055-MAP
)
KACEY JONES,)
Defendant.)

**GOVERNMENT'S OPPOSITION TO THE DEFENDANT'S MOTION TO BE
PROVIDED WITH INTERNAL INVESTIGATION REPORTS RELEVANT TO A
GOVERNMENT WITNESS (DKT. # 46)**

In response to the allegations concerning Officer Trombley, the government has re-requested¹ the following information concerning Officer Michael Trombley from the Springfield Police Department and the Massachusetts State Police:

"(a) any finding of misconduct that reflects upon the truthfulness or possible bias of these individuals, (b) any past or pending criminal charge brought against any of these individuals, and, (c) any credible allegation of misconduct that reflects upon the truthfulness or possible bias of these individuals that is the subject of a pending investigation.

In addition to the foregoing, I request that you provide to me, with respect to these individuals, any allegations which could not be substantiated, were found to be not credible, or have resulted in the exoneration of these individuals insofar as those allegations reflect upon the truthfulness or bias of these individuals and (a) were made by a prosecutor, magistrate judge, or judge or (b) received publicity."

The government has not yet received a response from the respective agencies. Once the agencies respond, the government will review the respective responses for disclosure to counsel.

¹The government initially sent this request to the Springfield Police Department prior to Officer Trombley's testimony on October 20, 2005. Acting Chief William Fitchett replied that the Springfield Police had no such information concerning Trombley.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney